

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Nicole Wilkins	:	Case No.: 16-15547(MDC)
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Nicole Wilkins, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about August 4, 2016.
2. The Chapter 13 filing was assigned case number 16-15547-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 8, 2017.
4. On or about June 9, 2020 the Debtors and the mortgagee, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the June 9, 2020 Stipulation, the Debtors are delinquent in the sum of \$1,384.08 in post-petition mortgage payments. A true and correct copy of the June 9, 2020 Stipulation is attached hereto as **Exhibit “A.”**
6. In accordance with the Stipulation, the Debtor will cure the subject \$1,384.08 by amending the Chapter 13 plan within 10 days of the entry of the Order.
7. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is deemed affordable by the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: June 17, 2020

/s/Brad J. Sadek, Esq.
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